

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DOCKET NO: 14-CR-10307-DPW

MICHAEL GORDON

DEFENDANT'S SUPPLEMENTAL SUGGESTED CONDITIONS OF RELEASE

Now comes the undersigned counsel of record and **respectfully makes the following amended suggested conditions of release:**

1. That an appearance bond in the amount of \$57,000 (fifty seven thousand dollars) secured with a mortgage (or attachment) to Mr. Lloyd Patrick Gayle and his residence of 44 Faunce Street, in Mattapan, Massachusetts. Mr. Gayle is prepared to execute a mortgage and escrow agreement with the Clerk's Office of the United States District Court in this amount. Mr. Gayle will satisfy all other requirements of posting real estate as set forth by the Clerk's office criteria for posting real estate as bail;
2. That the defendant execute an unsecured bond in the amount of \$100,000 (one hundred thousand dollars);
3. That the defendant be subject to electronic monitoring during the pendency of the case and reside at his Randolph, Massachusetts residence on 4 Gardner Street;
4. That his daughter Michaela Gordon serve as third party custodian to him and reside at his residence during the pendency of this case;

5. That the defendant report in person or by telephone with the Office of Pre Trial Services on a weekly basis during the pendency of this case;
6. That the defendant refrain from violating any federal or state laws;
7. That the defendant surrender any passport he possesses. If the defendant does not possess such a passport, he agrees to not apply for any such passport while out on release during the pendency of this case;
8. That the defendant refrain from any contact with any witness associated with the pending prosecution against him;
9. That the defendant not possess a firearm or other dangerous weapon;
10. That the defendant not travel outside the State of Massachusetts without seeking permission from the Court;
11. And any other further condition the Court believes appropriate to ensure the defendant's appearance at trial.

Wherefore, the defendant respectfully requests that he be released from custody during the pendency of this matter pursuant to the conditions referenced above and any other conditions that the Court deems appropriate.

Respectfully submitted,
Michael Gordon,
by his lawyer,

Date November 21, 2014

/s/William Keefe
William Keefe
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CERTIFICATE OF SERVICE

I, William Keefe, hereby certify a copy of the Defendant's Supplemental Suggested Conditions of Release and attached Affidavit of Saffron Jaggan were electronically filed with the United States Attorney, United States Attorney's Office, 1 Courthouse Way, Boston, Ma 02210, today, November 21, 2014.

/s/William Keefe